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By ECF June 15, 2022

Hon. Stewart D. Aaron United States District Court for the Southern District of New York 500 Pearl Street New York, New York 10007

Re: Allianz Global Investors GmbH, et al. v. Bank of Am. Corp., et al., 1:18-cv-10364

Dear Judge Aaron:

Pursuant to Section II(B)(3) of Your Honor's Individual Practices, we respectfully seek leave to file under seal unredacted versions of certain supporting papers and exhibits to the Citigroup Defendants' ("Citi") Motion for Issuance of a Hague Convention Request for International Judicial Assistance to Obtain Evidence in the Netherlands. These papers have been publicly filed with redactions, and unredacted versions are filed contemporaneously herewith under seal, accessible to counsel of record for the parties in this action.

This request asks the Court to seal documents that include or quote from chat transcripts and other documents that the Parties produced and designated as Confidential or Highly Confidential under the Protective Order, and personal information about the proposed deponents. Given that the Parties designated these materials as Confidential or Highly Confidential, and personal information of the deponents is contained within these papers, Citi respectfully requests that the Court grant Citi permission to file the requested documents in redacted form on ECF and in unredacted form under seal.

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Dated: June 15, 2022

Respectfully submitted,

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Request GRANTED. The proposed sealing requests are narrowly tailored to prevent unauthorized dissemination of sensitive business information. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). SO ORDERED. Dated: June 16, 2022

Att co an